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SEP 10 2008

September 10, 2008

Our Ref: 355-07/DPM/MAM

VIA FACSIMILE (with prior authorization) 212-805-7911

The Honorable John F. Keenan
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street, Room 1930
 New York, New York 10007

Re: Modesta Shipholding Ltd. v. LS Trading Engineering, S.A.,
 07-6942 (JFK)

USDC SDNY
 DOCUMENT
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 DATE FILED: 9-11-08

Dear Judge Keenan:

We represent the Plaintiff Modesta Shipholding Ltd. in connection with the above-referenced Rule B maritime attachment action. We write to request that the pre-trial conference scheduled for September 15, 2008 be adjourned 60-days.

Plaintiff initiated this action seeking security in the sum of \$315,268.35 for its maritime claim via an attachment of Defendant's property in this District pursuant to Rule B. On or about August 28, 2007, Deutsche Bank advised us that, pursuant to the Order of Attachment, it had seized the sum of \$3,348.48 belonging to Defendant. On that same day, we provided Notice of Attachment. In response to our Notice, Defendant contacted us on August 29 and demanded copies of the pleadings. We responded the same day, e-mailing to Defendant copies of the Verified Complaint, the Summons, the Order of Attachment and the Process of Maritime Attachment and Garnishment. To date, however, Defendant has not appeared or moved to vacate the attachment. We continue to effect daily service of the writ in an attempt to fully secure Plaintiff's claim.

In light of the foregoing considerations, we therefore respectfully request that Your Honor grant the within application.

The Honorable John F. Keenan
September 10, 2008
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We thank the Court for its attention to this matter.

Respectfully submitted,

FREEHILL HOGAN & MAHAR, LLP


Manuel A. Molina

The application is granted.
The conference is adjourned until
November 13, 2008 at 10:15 a.m.

SO ORDERED.

Dated: New York, N.Y.
September 11, 2008


U.S.D.J.